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Revised 5/01

CORRES. CONTROL  
INCOMING LTR NO.

00453 RF 01

DUE DATE

ACTION



2001 JUL -5 P 12:08

Department of Energy

CORRESPONDENCE  
CONTROL

ROCKY FLATS FIELD OFFICE  
10808 HIGHWAY 93, UNIT A  
GOLDEN, COLORADO 80403-8200

01-DOJ

JUL 03 2001

Mr. Steven H. Gunderson

Rocky Flats Cleanup Agreement Project Coordinator  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80246-1530

Dear Mr. Gunderson:

This letter is in response to your correspondence of April 10, 2001, regarding Reconnaissance Characterization Report (RLCR) of Buildings 111 and 333.

We will keep you informed using the consultative process of the quantity and disposal plan for the concrete that has some surficial Polychlorinated Biphenyls (PCB) contamination as approved from the Environmental Protection Agency is obtained for management of those bulk PCBs. It is possible some of the concrete containing very low levels of PCB will be recycled as fill for a foundation hole if the risk analysis shows such recycling to be acceptable. The project closure report will provide such information and documentation.

Your letter is requesting additional information on several issues; the following is a response to those requests:

**REQUEST:** That additional waste information be provided.

**RESPONSE:** A revised Section 5 was transmitted to the Colorado Department of Public Health and Environment on April 12, 2001, providing the information concerning amounts of contaminated wastes generated by disposal of the buildings.

**REQUEST:** Equipment in the building be listed as waste in Section 5 of the RLCR.

**RESPONSE:** The K-H contract with the demolition contractor ensures disposition equipment in the building as waste or reuse as appropriate.

**REQUEST:** Slabs and concrete be further characterized.

**RESPONSE:** The building has been characterized per the previously submitted RLCR. Reconnaissance Level Characterization was prepared in accordance with the Decontamination and Decommissioning Characterization Protocol and the Pre-Demolition Survey Plan. The Toxicity Characteristic Leaching Procedure (TCLP) testing already completed meets the requirements of the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for recycling concrete free release criteria under 6 CCR 1007-3, Part 261 in that the free release

DIST.	LTR	END
BOGENBERGER, V.		
BOGNAR, E.		
BRALLSFORD, M.D.		
BURNS, T.F.		
DECK, C.A.		
DIETERLE, S.E.		
FERRERA, D.W.		
FERRI, M.S.		
FRASER, R.G.		
FULTON, J.C.		
GERMAIN, A.L.		
GIACOMINI, J.		
ISOM, J.H.		
LEONARD, R.C.		
MARTINEZ, L.A.	X	
MOTES, J.L.		
NORTH, K.		
PARKER, A.M.		
POWERS, K.P.		
RAAZ, R.D.		
RODGERS, A.D.		
SANDLIN, N.B.	X	
SCOTT, G.K.		
SHELTON, D.C.	X	
SPEARS, M.		
TRICE, K.D.		
TUOR, N.B.		
VOORHEIS, G.M.		
Gibbs, F.	X	
Frederick, C.	X	
Parsons, D.	X	

COR. CONTROL	X	X
ADMIN. RECORD		
PATS/130		

Reviewed for Addressee  
Corres. Control RFP

7/5/01  
Date

By *lg*

Ref Ltr. #

DOE ORDER #

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE



ADMIN RECORD

B111-A-000007

Mr. Steven H. Gunderson  
01-DOE-01191

2

JUL 03 2001

threshold for the Resource Conservation and Recovery Act (RCRA) constituents where "no listed hazardous waste or characteristic waste is present" is covered. Based on the RLC and TCLP analyses, a total metals analysis is not necessary to demonstrate that any hazardous substance poses a risk. This approach is consistent with the Rocky Flats Vision and is protective of human health and the environment.

**REQUEST:** Soil sampling around building.

**RESPONSE:** Soil sampling in the area of the building will be conducted as part of environmental restoration project in accordance with the Industrial Area Sampling and Analysis Plan, not as part of this project. No Individual Hazardous Substance Site has been identified as part of this project.

**REQUEST:** That abrasive blast material be further characterized and managed to prevent release during decommissioning.

**RESPONSE:** In that TCLP has been performed and no RCRA constituents found, the blast material does not require further characterization or management for disposal as waste. The exception to the above is that TCLP sampling will be conducted for the metal aggregate in the area of the hopper near Building 333.

If concrete recycling becomes an attractive option, the concrete RSOP will be invoked and its provisions followed.

Questions can be directed to Steve Tower, Rocky Flats Field Office, Projects Office at (303) 966-2133.

Sincerely,

  
Joseph A. Legare  
Assistant Manager  
for Environment and Stewardship

cc:

H. Dalton, AMP, RFFO  
S. Tower, FC, RFFO  
D. Shelton, K-H  
C. Freiboth, RISS  
F. Gibbs, RISS  
D. Parsons, RISS  
T. Rehder, EPA

**Luker, Steve**

**From:** Bemski, Mike  
**Sent:** Tuesday, October 31, 2000 10:14 AM  
**To:** Broussard, Marcella; Guthrie, Vern; Scott, Tom; Luker, Steve; Kelly, Gerard  
**Cc:** Ideker, Virgene; Nielsen, Delbert; Demos, Nick  
**Subject:** FW: Status 00R1034 & 00D1518

The below is in response to a phone call I made to Pat Preese earlier this morning as to why the overdue analytical results still had not been received.

Mike Bemski  
303-966-4090, FAX 966-5180  
dp 303-212-6271, Bldg. 116  
Email [mike.bemski@rfets.gov](mailto:mike.bemski@rfets.gov)

-----Original Message-----

**From:** Preese, Pat  
**Sent:** Tuesday, October 31, 2000 10:04 AM  
**To:** Bemski, Mike  
**Subject:** FW: Status 00R1034 & 00D1518

Mike here is the labs written response but I also spoke with the project manager at the lab. We should see 00R1034 by weeks end. 00D1518 should have 11/15. Pat

-----Original Message-----

**From:** Scott Hall [[SMTP:srh@mail.gel.com](mailto:SMTP:srh@mail.gel.com)]  
**Sent:** Tuesday, October 31, 2000 9:59 AM  
**To:** Preese Pat  
**Subject:** Re: Status 00R1034 & 00D1518

Pat,  
I don't have definite Pkg ship dates but had put all overdue KHCO packages as my top overall priorities with the metals group. 00R1034 is currently in packaging/validation. 00D1518 is due 11/15 and I would expect that we might be a few days late with that delivery. With a reallocation of resources, the metals group did get 71 packages out of backlog last week which is phenomenal. Hopefully we will be completely back on track soon. I'll send you due dates for all packages as soon as I receive word on them.

Scott

"Preese, Pat" wrote:

Hey Scott,  
Will you please check the status for these two?

00R1034 is for TCLP Metals.

00D1518 is for the Metals analysis that we had Southwest Labs of Oklahoma send to you. I know you said that you would do your best but that things were backed up. I'm attempting to get a ballparkish date to give the customer so he can plan his project.

Please let me know what you find. Thanks, Pat

*CORE*

*SLUDGES*

*PCB SLUDGES*

**Parsons, Duane**

**From:** Luker, Steve  
**Sent:** Thursday, March 29, 2001 9:44 AM  
**To:** Nesta, Stephen; Parsons, Duane  
**Subject:** Bldg 111 PCB Statistics - 1st & 2nd Stories

Gentlemen,

Conclusions and observations on the subject matter are highlighted below:

- **We pass, barely.** The 95% Upper Confidence Limit (95% UCL) on the mean is 49 ppm: 1 entire ppm below the regulatory threshold of 50 ppm.
- **Conservatism of the Conclusion.** The statistic given above, i.e., the 95% UCL, is artificially high (a "conservative" value), because many samples yielded poor (translated – "high") detection limits due to sample dilutions. Many of the samples (~11) should not have been diluted as high as they were (20x). Smaller dilution factors would yield lower detection limits and, consequently, lower concentration values for computation of the statistic. Stated differently, the 95% UCL is probably much less than 49 ppm.

(NOTE: in the "real-world", we would direct the lab to rerun the over-diluted samples so that lower detection limits, and greater accuracy, could be attained.)

- **Repeatability of Results.** Precision of the sample set was adequate, based on 3 field duplicate samples submitted blind to the lab (relative percent differences <<20%)
- **Sampling Power.** The number of actual samples taken – 22 real and 3 QC – was more than adequate to characterize the paint population, based on comparison with EPA QA/G-4 estimates (≥5 samples required) and MARSSIM (12 – 20 samples, at 90% to 95% confidence, respectively).

The spreadsheet values are attached.

Please call or stop-by to discuss as needed.

Thanks.

**sl x7291**



B111 upper PCB-1  
copy.xls

4/4